



Infrastructure, environment, buildings

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Subject

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Supplemental Remedial Investigations/Feasibility Studies Monthly Progress Report
Area 1 – Morrow Dam to Plainwell Dam (November 2008)

SEDIMENTS

Dear Jim:

Attached is the 21st monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Supplemental Remedial Investigation/Feasibility Study (SRI/FS) – Area 1. This progress report is submitted as per Paragraph 37 of the February 2007 Administrative Settlement Agreement and Order on Consent (AOC) for Remedial Investigations/Feasibility Studies (Docket No. V-W-07-C-864), as well as Section 7.1 of the associated Statement of Work (SOW). If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS

Michael J. Erickson, P.E.
Associate Vice President

Date

December 15, 2008

Contact

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Our ref

B0064539.00014 #2

Attachments

Copies

Michael Berkoff, USEPA
Sam Chummar, USEPA
Michael Ribordy, USEPA
Paul Bucholtz, MDEQ (with Attachment A)
Jeff Keiser, CH2M HILL (with Attachment A)
Todd Goeks, NOAA (with Attachment A)
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**MONTHLY PROGRESS REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE SRI/FS
AREA 1 (MORROW DAM TO PLAINWELL DAM)**

REPORT #21, NOVEMBER 2008

**PREPARED BY ARCADIS
DECEMBER 15, 2008**

ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP (KRSG)

SUBMITTED TO

**JAMES SARIC, REMEDIAL PROJECT MANAGER
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (USEPA)**

**Monthly Progress Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site SRI/FS – Area 1**

REPORT #21, NOVEMBER 2008

**Significant Developments and Activities During the Period, Including Actions Undertaken
Pursuant to the AOC and SOW**

- On November 4, ARCADIS transmitted to USEPA the Conceptual Design Report for bank removal and restoration for the Plainwell No. 2 Dam Area.
- On November 5, ARCADIS forwarded co-located soil and earthworm data to the Peer Review Panel.
- On November 6, USEPA forwarded its comments to ARCADIS on the October version of the Conceptual Site Model (CSM) The CSM is discussed in Section 1.2.1.4 of the SOW.
- On November 10, ARCADIS submitted to USEPA its responses to USEPA's October 15 comments on the proposed sampling plan for the Phase 2 Portage Creek sediment investigation.
- On November 10, ARCADIS submitted to USEPA the Phase 2 Sampling Plan for the Portage Creek Sediment Investigation. This sampling is discussed in Section 3.4.1 3 of the Area 1 SRI/FS Work Plan In accordance with Section 48B of the AOC, this submittal also provided notification of sample collection activities.
- On November 12, Michigan Department of Environmental Quality (MDEQ) forwarded its comments to ARCADIS on the October version of the CSM
- On November 17, ARCADIS submitted to USEPA its responses to USEPA's comments on the revised SRI Phase 2 sediment core analyses plan.
- On November 17, ARCADIS submitted to USEPA the revised SRI Phase 2 sediment core analyses plan. This sampling is discussed in Sections 3.4.1.1 and 3.4.1.2 of the Area 1 SRI/FS Work Plan. In accordance with Section 48B of the AOC, this submittal also provided notification of sample collection activities.
- On November 20, ARCADIS hosted a boat tour of the Plainwell No. 2 Dam Area for USEPA.
- On November 26, ARCADIS forwarded soil and shrew tissue data to the Peer Review Manager.
- The KRSG awaits USEPA's response to the letter requesting USEPA's data usability determination for existing data for purposes of the SRI/FS, which was submitted to USEPA on August 27, 2007.
- The KRSG awaits USEPA's comments on the remaining Multi-Area FS documents (Section 1 2.2 of the SOW) and the Candidate Technologies and Testing Needs Technical Memorandum (Section 4.1 of the SOW), which were submitted to USEPA on February 22.

**Monthly Progress Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site SRI/FS – Area 1**

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- The KRSG awaits USEPA's approval of the Phase 2 Sampling Plan for the Portage Creek Sediment Investigation, which was submitted to USEPA on November 10.
- The KRSG awaits USEPA's approval of the revised SRI Phase 2 sediment core analyses plan, which was submitted to USEPA on November 17

Data Collected and Field Activities Conducted During the Period

- In November, ARCADIS continued to collect water column samples every other day at the upstream and downstream locations related to the former Plainwell Impoundment Time-Critical Removal Action (TCRA). Table A summarizes the collected samples that were sent to TestAmerica for analysis. This sampling is discussed in Section 3.4.5 of the Area 1 SRI/FS Work Plan.
- On November 10 and 11, ARCADIS collected yearling smallmouth bass in the Otsego City Impoundment (Area 2). This fish sampling is described in Section 3.4.5 of the Area 1 SRI Work Plan. Table B summarizes the collected samples that were sent to TestAmerica for analysis

Laboratory Data Received During the Period

- In November, ARCADIS received laboratory data for the surface water samples collected between October 12 and November 11 (sample delivery groups [SDGs] TCRA90, TCRA92, TCRA94, TCRA97 and TCRA99). Table A presents a list of the samples for which data were received. The January 2009 monthly report will present the validated surface water data for these samples.
- Validated data for the SDGs received in September are included in this monthly report. These data include the surface water samples collected between August 10 and September 11 (SDGs TCRA70, TCRA73, TCRA75, TCRA78 and TCRA80) (Table C). Attachment A contains the validation reports for these data packages. The enclosed CD also contains the electronic data deliverable for these data.

Problems

- None.

Actions Taken to Correct Problems

- None.

**Monthly Progress Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site SRI/FS – Area 1**

REPORT #21, NOVEMBER 2008

Developments Anticipated During the Next Two Reporting Periods

- In December, USEPA and KRSG will continue to correspond as necessary with the Peer Review Manager (see Section 1.2.1.3 of the SOW)
- In December, ARCADIS is scheduled to submit a revised CSM in response to USEPA and MDEQ comments received in November.
- On December 1, ARCADIS is expected to receive the data for the yearling smallmouth bass that were collected in the Otsego City Impoundment (Area 2) in November.
- During the week of December 1, ARCADIS is scheduled to start collection of Phase 2 sediment cores in Portage Creek.
- During the week of December 1, ARCADIS is scheduled to perform the bathymetric monitoring in the Plainwell TCRA. This activity is described in Section 3.4.5 of the Area 1 SRI Work Plan.
- On December 1, ARCADIS is scheduled to submit to USEPA the proposed post-removal sediment sampling locations for the Plainwell TCRA. This sampling is described in Section 3.4.5 of the Area 1 SRI Work Plan.
- In December, ARCADIS is scheduled to perform the post-removal sediment sampling, contingent on USEPA approval of proposed sediment sampling locations. This activity is described in Section 3.4.5 of the Area 1 SRI Work Plan.
- On December 2, ARCADIS is scheduled to transmit photos from the November 20 Plainwell No. 2 Dam Area tour to USEPA.
- On December 4, USEPA, MDEQ, and Michigan Department of Natural Resources are scheduled to meet in Plainwell to discuss the Plainwell No. 2 Dam.
- On December 5, the Peer Review Panel is scheduled to release the Final Peer Review Consensus Report.
- During the week of December 8, ARCADIS is scheduled to collect data from the three staff gauges located in the Plainwell No. 2 Dam Area.
- On December 9, ARCADIS is scheduled to submit to USEPA a Phase 2 work plan for the Crown Vantage area. This sampling is described in Section 3.4.3 of the Area 1 SRI Work Plan. ARCADIS is planning to perform this work the week of January 12, 2009.

**Monthly Progress Report for the Allied Paper, Inc./Portage Creek/
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REPORT #21, NOVEMBER 2008

- On December 9, ARCADIS is scheduled to submit to USEPA a Phase 2 work plan for the focused step-out sampling in Area 1. This sampling is described in Section 3.4.4 of the Area 1 SRI Work Plan. ARCADIS is planning to start this work the week of January 5, 2009.
- During the week of December 15, ARCADIS is scheduled to process and submit the frozen sediment cores for analysis in accordance with the SRI Phase 2 sediment core analyses plan.
- In January 2009, ARCADIS will forward to USEPA the validated data received in October as part of the December monthly report. This includes the surface water samples collected between September 13 and October 14 (SDGs TCRA83, TCRA84, TCRA86, and TCRA88).

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Supplemental Remedial Investigations/Feasibility Studies
Monthly Report #21, November 2008

Table A — Upstream/Downstream Surface Water Sampling — Plainwell
TCRA — Samples Collected and Data Received in November 2008

Sample ID	Sample Date	Data Received	SDG	Sample Location
K30996	10/12/2008	11/5/2008	TCRA90_SDSP	Farmer Street Bridge
K30997	10/12/2008	11/5/2008	TCRA90_SDSP	10th Street Bridge
K30998	10/14/2008	11/5/2008	TCRA90_SDSP	Farmer Street Bridge
K30999	10/14/2008	11/5/2008	TCRA90_SDSP	10th Street Bridge
K31000	10/16/2008	11/7/2008	TCRA92_SDSP	Farmer Street Bridge
K31001	10/16/2008	11/7/2008	TCRA92_SDSP	10th Street Bridge
K31002	10/18/2008	11/7/2008	TCRA92_SDSP	Farmer Street Bridge
K31003	10/18/2008	11/7/2008	TCRA92_SDSP	10th Street Bridge
K31004	10/20/2008	11/7/2008	TCRA92_SDSP	Farmer Street Bridge
K31005	10/20/2008	11/7/2008	TCRA92_SDSP	10th Street Bridge
K31006	10/22/2008	11/7/2008	TCRA92_SDSP	Farmer Street Bridge
K31007	10/22/2008	11/7/2008	TCRA92_SDSP	10th Street Bridge
K31008 ¹	10/24/2008	11/7/2008	TCRA92_SDSP	Farmer Street Bridge
K31009	10/24/2008	11/7/2008	TCRA92_SDSP	10th Street Bridge
K31010	10/26/2008	11/19/2008	TCRA94_SDSP	Farmer Street Bridge
K31011	10/26/2008	11/19/2008	TCRA94_SDSP	10th Street Bridge
K31012	10/26/2008	11/19/2008	TCRA94_SDSP	10th Street Bridge
K31013	10/28/2008	11/19/2008	TCRA94_SDSP	Farmer Street Bridge
K31014	10/28/2008	11/19/2008	TCRA94_SDSP	10th Street Bridge
K31015	10/30/2008	11/19/2008	TCRA94_SDSP	Farmer Street Bridge
K31016 ¹	10/30/2008	11/19/2008	TCRA94_SDSP	10th Street Bridge
K31017	11/1/2008	11/28/2008	TCRA97_SDSP	Farmer Street Bridge
K31018	11/1/2008	11/28/2008	TCRA97_SDSP	10th Street Bridge
K31019	11/3/2008	11/28/2008	TCRA97_SDSP	Farmer Street Bridge
K31020	11/3/2008	11/28/2008	TCRA97_SDSP	10th Street Bridge
K31021	11/5/2008	11/28/2008	TCRA97_SDSP	Farmer Street Bridge
K31022	11/5/2008	11/28/2008	TCRA97_SDSP	10th Street Bridge
K31023	11/7/2008	11/28/2008	TCRA97_SDSP	Farmer Street Bridge
K31024	11/7/2008	11/28/2008	TCRA97_SDSP	10th Street Bridge
K31025	11/9/2008	11/28/2008	TCRA99_SDSP	Farmer Street Bridge
K31026	11/9/2008	11/28/2008	TCRA99_SDSP	10th Street Bridge
K31027	11/11/2008	11/28/2008	TCRA99_SDSP	Farmer Street Bridge
K31028	11/11/2008	11/28/2008	TCRA99_SDSP	10th Street Bridge
K31029	11/13/2008	NR	--	Farmer Street Bridge
K31030	11/13/2008	NR	--	10th Street Bridge
K31031	11/15/2008	NR	--	Farmer Street Bridge
K31032	11/15/2008	NR	--	10th Street Bridge
K31033	11/17/2008	NR	--	Farmer Street Bridge
K31034	11/17/2008	NR	--	10th Street Bridge
K31035 [K31036]	11/19/2008	NR	--	Farmer Street Bridge
K31037 ¹	11/19/2008	NR	--	10th Street Bridge
K31038	11/21/2008	NR	--	Farmer Street Bridge
K31039	11/21/2008	NR	--	10th Street Bridge

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Table A — Upstream/Downstream Surface Water Sampling — Plainwell
TCRA — Samples Collected and Data Received in November 2008

Sample ID	Sample Date	Data Received	SDG	Sample Location
K31040	11/23/2008	NR	--	Farmer Street Bridge
K31041	11/23/2008	NR	--	10th Street Bridge
K31042	11/25/2008	NR	--	Farmer Street Bridge
K31043	11/25/2008	NR	--	10th Street Bridge
K31044	11/29/2008	NR	--	Farmer Street Bridge
K31045	11/29/2008	NR	--	10th Street Bridge
K31046	12/1/2008	NR	--	Farmer Street Bridge
K31047	12/1/2008	NR	--	10th Street Bridge

Notes:

NR - Data not received as of November 30, 2008

SDG - Sample Delivery Group.

All samples analyzed by TestAmerica Laboratories, Inc for PCBs and TSS

Duplicate samples are in brackets

¹MS/MSD performed on this sample

Kalamazoo River Study Group
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Table B — Yearling Smallmouth Bass Sampling — Otsego City Impoundment — Samples Collected in November 2008

Sample ID	Date Collected	Number of Individuals in Sample	Total Length (cm)/Weight (g) ¹								
SMB-13	11/10/08	4	12 3	13 1	14 8	15 3	—	—	—	—	—
			20 8	21 9	38 5	40 2	—	—	—	—	—
SMB-14	11/10/08	7	14 0	14 2	14 3	14 4	14 4	14 5	14 6	—	—
			30 8	34 3	35 6	36 6	35 6	39 5	37 4	—	—
SMB-15	11/10/08	7	13 7	13 7	13 7	13 8	14 1	14 1	14 2	—	—
			32 3	30 8	27 0	29 9	33 4	31 0	33 5	—	—
SMB-16	11/10/08	9	12 5	13 1	13 1	13 1	13 2	13 4	13 6	13 6	13 8
			23 5	27 6	27 2	26 5	28 1	29 5	32 1	32 7	32 2
SMB-17	11/11/08	8	14 5	14 5	14 5	14 6	14 7	14 8	15 1	15 2	—
			38 6	39 1	32 1	37 8	40 7	39 8	41 7	44 0	—
SMB-18	11/11/08	7	13 6	13 7	13 8	13 9	14 2	14 4	14 5	—	—
			32 4	33 3	32 3	32 5	34 4	35 4	37 6	—	—
SMB-19	11/11/08	7	12 2	12 3	12 6	13 0	13 3	13 4	13 5	—	—
			21 1	23 5	22 4	27 5	31 1	29 6	27 9	—	—

Notes:

1 Lengths and weights are ordered and correspond to individual fish
All samples are whole-body composites
All samples analyzed by TestAmerica Laboratories for PCBs and lipids
cm = centimeter
g = grams

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Supplemental Remedial Investigations/Feasibility Studies
Monthly Report #21, November 2008

Table C — Results for Upstream/Downstream Surface Water — Plainwell TCRA — Samples Collected in August and September 2008

Sample I.D.: Location ID: Sample Date:	Units	10th Street 08/10/08	10th Street 08/12/08	10th Street 08/14/08	10th Street 08/16/08	10th Street 08/18/08	10th Street 08/20/08	10th Street 08/22/08	10th Street 08/24/08	10th Street 08/26/08
PCB Aroclors										
Aroclor-1016	µg/L	0 048 UJ	0 047 U	0 047 U	0 068 U	0 047 U	0 047 U	0 047 UJ	0 048 U	0 054 U
Aroclor-1221	µg/L	0 048 UJ	0 047 U	0 047 U	0 068 U	0 047 U	0 047 U	0 047 UJ	0 048 U	0 054 U
Aroclor-1232	µg/L	0 048 UJ	0 047 U	0 047 U	0 068 U	0 047 U	0 047 U	0 047 UJ	0 048 U	0 054 U
Aroclor-1242	µg/L	0 048 UJ	0 047 U	0 047 U	0 068 U	0 047 U	0 047 U	0 047 UJ	0 048 U	0 054 U
Aroclor-1248	µg/L	0 048 UJ	0 047 U	0 047 U	0 068 U	0 047 U	0 047 U	0 047 UJ	0 048 U	0 054 U
Aroclor-1254	µg/L	0 048 UJ	0 047 U	0 047 U	0 068 U	0 047 U	0 047 U	0 047 UJ	0 048 U	0 054 U
Aroclor-1260	µg/L	0 048 UJ	0 047 U	0 047 U	0 068 U	0 047 U	0 047 U	0 047 UJ	0 048 U	0 054 U
Total PCBs	µg/L	0 048 U	0 047 U	0 047 U	0 068 U	0 047 U	0 047 U	0 047 U	0 048 U	0 054 U
Miscellaneous										
Total Suspended Solids	mg/L	25 1	20	27 5	9 4	16 9	15 5	18 6	15 6	19 8

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Table C — Results for Upstream/Downstream Surface Water — Plainwell TCRA — Samples Collected in August and September 2008

Sample I.D.: Location ID: Sample Date:	Units	10th Street 08/28/08	10th Street 08/29/08	10th Street 09/01/08	10th Street 09/03/08	10th Street 09/05/08	10th Street 09/07/08	10th Street 09/09/08	10th Street 09/11/08	Farmer Street 08/10/08
PCB Aroclors										
Aroclor-1016	µg/L	0 047 U	0 048 U	0 058 U	0 047 U	0 047 U	0 050 U	0 047 U	0 076 U	0 048 U
Aroclor-1221	µg/L	0 047 U	0 048 U	0 058 U	0 047 U	0 047 U	0 050 U	0 047 U	0 076 U	0 048 U
Aroclor-1232	µg/L	0 047 U	0 048 U	0 058 U	0 047 U	0 047 U	0 050 U	0 047 U	0 076 U	0 048 U
Aroclor-1242	µg/L	0 047 U	0 048 U	0 058 U	0 047 U	0 047 U	0 050 U	0 047 U	0 076 U	0 048 U
Aroclor-1248	µg/L	0 047 U	0 048 U	0 058 U	0 047 U	0 047 U	0 050 U	0 047 U	0 076 U	0 048 U
Aroclor-1254	µg/L	0 047 U	0 048 U	0 058 U	0 047 U	0 047 U	0 050 U	0 047 U	0 076 U	0 048 U
Aroclor-1260	µg/L	0 047 U	0 048 U	0 058 U	0 047 U	0 047 U	0 050 U	0 047 U	0 076 U	0 048 U
Total PCBs	µg/L	0 047 U	0 048 U	0 058 U	0 047 U	0 047 U	0 050 U	0 047 U	0 076 U	0 048 U
Miscellaneous										
Total Suspended Solids	mg/L	14 5	12 7	13 5	13 2	48	15 7	30 4	22 4	41 6

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Table C — Results for Upstream/Downstream Surface Water — Plainwell TCRA — Samples Collected in August and September 2008

Sample I.D.: Location ID: Sample Date:	Units	Farmer Street 08/12/08	Farmer Street 08/14/08	Farmer Street 08/16/08	Farmer Street 08/18/08	Farmer Street 08/20/08	Farmer Street 08/22/08	Farmer Street 08/24/08
PCB Aroclors								
Aroclor-1016	µg/L	0 052 U [0 049 U]	0 049 U	0 050 U	0 047 U	0 048 U	0 047 U	0 048 U
Aroclor-1221	µg/L	0 052 U [0 049 U]	0 049 U	0 050 U	0 047 U	0 048 U	0 047 U	0 048 U
Aroclor-1232	µg/L	0 052 U [0 049 U]	0 049 U	0 050 U	0 047 U	0 048 U	0 047 U	0 048 U
Aroclor-1242	µg/L	0 052 U [0 049 U]	0 049 U	0 050 U	0 047 U	0 048 U	0 047 U	0 048 U
Aroclor-1248	µg/L	0 052 U [0 049 U]	0 049 U	0 050 U	0 047 U	0 048 U	0 047 U	0 048 U
Aroclor-1254	µg/L	0 052 U [0 049 U]	0 049 U	0 050 U	0 047 U	0 048 U	0 047 U	0 048 U
Aroclor-1260	µg/L	0 052 U [0 049 U]	0 049 U	0 050 U	0 047 U	0 048 U	0 047 U	0 048 U
Total PCBs	µg/L	0 052 U [0 049 U]	0 049 U	0 050 U	0 047 U	0 048 U	0 047 U	0 048 U
Miscellaneous								
Total Suspended Solids	mg/L	19 J [41 1 J]	24 8	9 5	18	9 3	22 8	1 9

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Table C — Results for Upstream/Downstream Surface Water — Plainwell TCRA — Samples Collected in August and September 2008

Sample ID: Location ID: Sample Date:	Units	Farmer Street 08/26/08	Farmer Street 08/28/08	Farmer Street 08/29/08	Farmer Street 09/01/08	Farmer Street 09/03/08	Farmer Street 09/05/08	Farmer Street 09/07/08
PCB Aroclors								
Aroclor-1016	µg/L	0.047 U	0.048 UJ	0.048 U	0.048 U	0.049 U	0.047 U [0.049 U]	0.047 U
Aroclor-1221	µg/L	0.047 U	0.048 UJ	0.048 U	0.048 U	0.049 U	0.047 U [0.049 U]	0.047 U
Aroclor-1232	µg/L	0.047 U	0.048 UJ	0.048 U	0.048 U	0.049 U	0.047 U [0.049 U]	0.047 U
Aroclor-1242	µg/L	0.047 U	0.048 UJ	0.048 U	0.048 U	0.049 U	0.047 U [0.049 U]	0.047 U
Aroclor-1248	µg/L	0.047 U	0.048 UJ	0.048 U	0.048 U	0.049 U	0.047 U [0.049 U]	0.047 U
Aroclor-1254	µg/L	0.047 U	0.048 UJ	0.048 U	0.048 U	0.049 U	0.047 U [0.049 U]	0.047 U
Aroclor-1260	µg/L	0.047 U	0.048 UJ	0.048 U	0.048 U	0.049 U	0.047 U [0.049 U]	0.047 U
Total PCBs	µg/L	0.047 U	0.048 U	0.048 U	0.048 U	0.049 U	0.047 U [0.049 U]	0.047 U
Miscellaneous								
Total Suspended Solids	mg/L	3.8	13.1	2.3	1.4	0.8	49.6 [55.7]	1.9

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Table C — Results for Upstream/Downstream Surface Water — Plainwell TCRA — Samples Collected in August and September 2008

Sample I.D.:	Location ID:	Sample Date:	Units	Farmer Street 09/09/08	Farmer Street 09/11/08
PCB Aroclors					
Aroclor-1016			µg/L	0.047 U	0.047 U
Aroclor-1221			µg/L	0.047 U	0.047 U
Aroclor-1232			µg/L	0.047 U	0.047 U
Aroclor-1242			µg/L	0.047 U	0.047 U
Aroclor-1248			µg/L	0.047 U	0.047 U
Aroclor-1254			µg/L	0.047 U	0.047 U
Aroclor-1260			µg/L	0.047 U	0.047 U
Total PCBs			µg/L	0.047 U	0.047 U
Miscellaneous					
Total Suspended Solids			mg/L	36	18

Notes:

J - The compound was positively identified, however, the associated numerical value is an estimated concentration only

U - The compound was analyzed for but not detected. The associated value is the compound quantitation limit

UJ - The compound was not detected above the reported sample quantitation limit. However, the reported limit is approximate and may or may not represent the actual limit of quantitation

Duplicate results are in brackets

Data received in September 2008